

Whitt Law Firm, LLC

ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

OF COUNSEL:

RICHARD L. WHITT

JEFFERSON D. GRIFFITH, III

401 WESTERN LANE, SUITE E,
IRMO, SOUTH CAROLINA 29063
MAILING ADDRESS: POST OFFICE BOX 362
IRMO, SOUTH CAROLINA 29063
TELEPHONE: (803) 995-7719

April 16, 2021

VIA, ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina

- Re: • South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to
 S.C. Code Ann. Section 58-37-40 and Integrated Resource Plans for Duke
 Energy Carolinas, LLC and Duke Energy Progress, LLC;
 • Dockets 2019-224-E and 2019-225-E
 • **Motion to Excuse “Late” Filing**

Ms. Boyd:

The undersigned is counsel of record for the Carolinas Clean Energy Business Association (“CCEBA”), in the two above-referenced Dockets. Please treat this correspondence as our Motion. My client’s Surrebuttal Testimonies were due to be e-filed with this Commission yesterday and one of our three Witness’ filings, was not completed until after the noon deadline.

Our first two Witness Testimony filings, which were made well before noon, were accepted for filing, without any difficulty. However, our third filing, which was attempted beginning at 11:45 a.m., was not accepted. My legal assistant, Carrie, tried repeatedly to make this filing, for over 40 minutes, even reducing the size of the filing several times, to no avail. We were able to eventually make the filing, after the noon deadline. It appears that multiple voluminous filings overpowered the Commission’s systems and the “late” filings, could not be avoided.

The ground for this Motion is explained hereinabove and I request that the “late” filing of one of our Witness’ Testimonies be excused.

Ltr. to Boyd
April 16, 2021
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Please advise if any additional information is required for CCEBA's request and this request is,

Respectfully Submitted,

/s/Richard L. Whitt

Richard L. Whitt,

*As Counsel for Carolinas Clean Energy
Business Association.*

RLW/cas

cc: All parties of record in Dockets 2019-224-E and 2019-225-E, *via electronic mail*